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*Plaintiffs' Liaison Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:  
*Brittany Doffing*, 4:22-cv-05892;  
*Malinda Harris*, 4:22-cv-06085;

**DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS IN SUPPORT OF  
PLAINTIFFS' CONSOLIDATED *EX*  
*PARTE* APPLICATION FOR**

**APPOINTMENT OF GUARDIANS *AD LITEM***

1 *Ayla Tanton*, 4:22-cv-06545;  
2 *Megan Waddell*., 4:22-cv-05888;  
3 *Virginia Roth*, 4:22-cv-05884;  
4 *Cecelia Tesch*, 4:22-cv-06167;  
5 *Apriel Dorsey*, 4:22-cv-06451;  
6 *Damian Johnson (and as next of friend to*  
7 *minors K.L.J., J.A.J., and K.A.J.)*, 4:22-cv-  
8 06418;  
9 *E.W.*, 4:22-cv-04528;  
10 *M.C.*, 4:22-cv-04529;  
11 *T.K.*, 4:22-cv-04588;  
12 *T.R.*, 4:22-cv-04712;  
13 *C.C.*, 4:22-cv-04709;  
14 *J.H. (and as next of friend to minors N.R.*  
15 *and A.M.)*, 4:22-cv-04710;  
16 *Shaw Jamerson*, 4:22-cv-06384;  
17 *L.A.T. (and as next of friend to minors P.T.*  
18 *and L.T.)*, 4:22-cv-04937;  
19 *S.R.*, 4:22-cv-06455;  
20 *Andrea Harrison*, 4:22-cv-06452;  
21 *Bethany Odems*, 4:22-cv-06440;  
22 *Sabrina Huff-Young*, 4:22-cv-06430;  
23 *Luvonia Brown*, 4:22-cv-06668;  
24 *Tabitha Quinones*, 4:22-cv-06431;  
25 *Shanetta Kimber (and as next friend to minor*  
26 *D.K.)*, 4:22-cv-06434;  
27 *Mandy S. Westwood*, 4:22-cv-06461;  
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1 *Robert Turgeon*, 4:22-cv-06616;  
2 *Angela Canche*, 4:22-cv-06449;  
3 *Bernard Cerone*, 4:22-cv-06417;  
4 *Jennifer Koutsouftikis*, 4:22-cv-06643;  
5 *T.S.*, 4:22-cv-06454;  
6 *Chad Smith*, 4:22-cv-06421;  
7 *Stoudemire (on behalf of De'John*  
8 *Davidson)*, 4:22-cv-06495;  
9 *Stoudemire (on behalf of Ja'Taasha*  
10 *Davidson)*, 4:22-cv-05987;  
11 *Tiffany Woods*, 4:22-cv-6591;  
12 *V.P.*, 4:22-cv-06617;  
13 *J.O.*, 4:22-cv-05546;  
14 *Rossana Agosta*, 4:22-cv-05565;  
15 *M.F., B.F., A.F.*, 4:22-cv-05573;  
16 *Nicholas Calvoni*, 4:22-cv-05873;  
17 *Dayna Page*, 4:22-cv-06124;  
18 *Sarie Neave*, 4:22-cv-06126;  
19 *Julie Kosiorek*, 4:22-cv-06142;  
20 *Zakey Amacker*, 4:22-cv-06150;  
21 *Tracy Hunt*, 4:22-cv-06155;  
22 *Tamesha Hicks*, 4:22-cv-06162;  
23 *D.D., G.D.*, 4:22-cv-06190;  
24 *Amanda Duke*, 4:22-cv-06200;  
25 *Danielle Cohen*, 4:22-cv-06207;  
26 *Kenisha Day*, 4:22-cv-06215;  
27 *I.A.*, 4:22-cv-06252;  
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1 *Margit LaBlue*, 4:22-cv-06256;  
2 *Khymberly Levin*, 4:22-cv-06263;  
3 *Christian Brooks*, 4:22-cv-06308;  
4 *Michelle Wheeldon*, 4:22-cv-06306;  
5 *Jessica Bright*, 4:22-cv-06318;  
6 *Rachelle Capka*, 4:22-cv-06583;  
7 *Lawanda Simpson*, 4:22-cv-06587;  
8 *Jeffrey Wombles*, 4:22-cv-06685;  
9 *Melanie Clarke-Penella*, 4:22-cv-06692;  
10 *Lorine Hawthorne*, 4:22-cv-06751;  
11 *Chris J. Czubakowski*, 4:22-cv-06989;  
12 *C.U.*, 4:22-cv-07347;  
13 *N.W.*, 4:22-cv-08937;  
14 *David Hemmer*, 4:23-cv-00055;  
15 *C.N.*, 4:22-cv-04283;  
16 *Star Wishkin*, 4:22-cv-06459;  
17 *Donna Copelton*, 4:22-cv-06165;  
18 *Diane Williams*, 4:22-cv-05886;  
19 *J.A., K.L., and A.L.*, 4:23-cv-00515;  
20 *G.W.*, 4:23-cv-00545  
21 *Elizabeth Mullen*, 4:23-cv- 00600;  
22 *A.C.*, 4:23-cv-00646;  
23 *D.D., J.D.*, 4:22-cv-06205;  
24 *Jessica Guerrero*, 4:22-cv-05894;  
25 *Stephanie Carter*, 4:22-cv-05986;  
26 *Kelli Cahoone*, 4:22-cv-06117;  
27 *Kim Isaacs*, 4:22-cv-05885;  
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1 *Edyta Lee*, 4:22-cv-06426;  
 2 *Shanetta Kimber (I)*, 4:22-cv-06498;  
 3 *Debra Hudson*, 4:22-cv-06296;  
 4 *Veronica Hicks*, 4:22-cv-06627;  
 5 *Donavette Ely*, 4:22-cv-06067  
 6

7 I, Jennie Lee Anderson, do hereby declare and state as follows:

8 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted  
 9 to practice before the courts of the State of California and in the Northern District of California. I  
 10 am the Court-appointed Liaison Counsel for Plaintiffs in *In re Social Media Adolescent*  
 11 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of  
 12 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I  
 13 make this declaration of my own personal knowledge and, if called as a witness, I could and  
 14 would testify competently to the matters stated below.

15 2. I make this declaration in support of Plaintiffs' Administrative Motion to File  
 16 Under Seal Exhibits in Support of Plaintiff's Consolidated *Ex Parte* Application for Appointment  
 17 of Guardian *Ad Litem* ("Administrative Motion to Seal").

18 3. For the reasons set forth in Plaintiffs' Administrative Motion to Seal filed  
 19 herewith, Plaintiffs seek to seal Exhibits 1-75 to the Declaration of Jennie Lee Anderson in  
 20 Support of Plaintiffs' Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*  
 21 ("Anderson Declaration").

22 4. True and correct copies of Exhibits 1-75 to the Anderson Declaration  
 23 accompany this Administrative Motion.

24 5. The parties have met and conferred and entered into a stipulation in satisfaction  
 25 of Civ. L.R. 7-11 submitted herewith.

26 I declare under penalty of perjury pursuant to the laws of the United States of America that  
 27 the foregoing is true and correct.  
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1 Dated: February 28, 2023

Respectfully submitted,

2 /s/Jennie Lee Anderson  
3 Jennie Lee Anderson  
4 *Plaintiffs' Liaison Counsel*

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